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Attorney for Defendants Delaware County d/b/a  
George W. Hill Correctional Facility, Laura K. Williams,  
Dele Faly and Lisa Mastroddi

**ANTHONY PIERRE,**

Plaintiff,

v.

**DELAWARE COUNTY D/B/A GEORGE  
W. HILL CORRECTIONAL FACILITY;  
LAURA K. WILLIAMS; DELE FALY;  
LISA MASTRODDI; K. MOORE; G.  
BLEE; MIKE MOORE; SERGEANT  
HAMRE; SERGEANT SICOLLE;  
SERGEANT RICHBERT; JESSAMINE  
HEALTHCARE, INC.; JESSAMINE  
HEALTHCARE, INC. D/B/A CORRECT  
CARE SOLUTIONS, LLC/ WELLPATH,  
LLC; DR. NANCY, PHYSICIAN FOR  
JESSAMINE HEALTHCARE, INC. D/B/A  
CORRECT CARE SOLUTIONS,  
LLC/WELLPATH, LLC; NURSE HAITAN,  
NURSE FOR JESSAMINE HEALTHCARE,  
INC. D/B/A CORRECT CARE  
SOLUTIONS, LLC/WELLPATH, LLC,**

: COURT OF COMMON PLEAS,  
: DELAWARE COUNTY, PENNSYLVANIA  
:  
: NO. CV-2022-004140  
:  
:

Defendants.

PLEASE TAKE NOTICE that a Notice of Removal of this action from the Court of Common Pleas of Delaware County, docketed at *Pierre v. Delaware County d/b/a George W. Hill Correctional Facility, et al.*, No. CV-2022-004140, to the United States District Court for the Eastern District of Pennsylvania, a copy of which is attached hereto as Exhibit A, has been filed in the United States District Court for the Eastern District of Pennsylvania. Accordingly,

and pursuant to 28 U.S.C. § 1446(d), this Court may proceed no further unless the case is remanded to it.

/s/Jeffrey M. Scott

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LLC; DR. NANCY, PHYSICIAN FOR  
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CORRECT CARE SOLUTIONS,  
LLC/WELLPATH, LLC; NURSE HAITAN,  
NURSE FOR JESSAMINE HEALTHCARE,  
INC. D/B/A CORRECT CARE  
SOLUTIONS, LLC/WELLPATH, LLC,**

: COURT OF COMMON PLEAS,  
: DELAWARE COUNTY, PENNSYLVANIA  
:  
: NO. CV-2022-004140

Defendants.

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the Notice of Filing of Notice of Removal was served on July 29, 2022, upon counsel through the electronic filing system, and by first class mail, addressed as follows:

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*/s/Jeffrey M. Scott*

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